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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

January 2007 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. MARICELA GONZALEZ-TREJO (1), MIGUEL ROMERO-RIOS (2), Defendants.	)	Criminal Case No. '08 CR 0545 LAB I N D I C T M E N T Title 8, U.S.C., Sec. 1324(a)(2)(B)(ii) - Bringing in Illegal Aliens for Financial Gain; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 8, U.S.C., Secs. 1324(a)(1)(A)(ii) and (v)(II) - Transportation of Illegal Aliens and Aiding and Abetting; Title 8, U.S.C., Secs. 1326(a) and (b) - Deported Alien Found in the United States

The grand jury charges:

Count 1

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Luis Alberto Ochoa-Castillo, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 2

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Luis Alberto Ochoa-Castillo, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 3

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Gabriel Castro-Garcia, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 4

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Gabriel Castro-Garcia, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 5

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Hector Cervantes-Avina, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien for the purpose of commercial advantage and private financial gain; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18, United States Code, Section 2.

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Count 6

On or about February 13, 2008, within the Southern District of California, defendants MARICELA GONZALEZ-TREJO and MIGUEL ROMERO-RIOS, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that an alien, namely, Hector Cervantes-Avina, had come to, entered and remained in the United States in violation of law, did transport and move said alien within the United States in furtherance of such violation of law; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(II).

Count 7

On or about February 13, 2008, within the Southern District of California, defendant MIGUEL ROMERO-RIOS, an alien, who previously had been excluded, deported and removed from the United States to Mexico, was found in the United States, without the Attorney General of the United States or his designated successor, the Secretary of the Department of Homeland Security (Title 6, United States Code, Sections 202(3) and (4), and 557), having expressly consented to the defendant's reapplication for admission into the United States; in violation of Title 8, United States Code, Sections 1326(a) and (b).

It is further alleged that defendant MIGUEL ROMERO-RIOS, was removed from the United States subsequent to August 9, 2006.

DATED: February 27, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:
W. MARK CONOVER
Assistant U.S. Attorney